

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARBUTUS BIOPHARMA CORPORATION
and GENEVANT SCIENCES GmbH,

Plaintiffs,

V.

MODERNA, INC. and MODERNATX, INC.,

Defendants.

C.A. No. 22-252-JDW

MODERNA, INC. and MODERNATX, INC.,

Counterclaim-Plaintiffs,

V.

ARBUTUS BIOPHARMA CORPORATION
and GENEVANT SCIENCES GmbH,

Counterclaim-Defendants.

**EXHIBITS G, H, K-N, Q AND T TO THE
DECLARATION OF MARK C. MCLENNAN IN SUPPORT OF
MODERNA'S MOTION TO EXCLUDE THE EXPERT OPINIONS OF
CATHARINE LAWTON, GEORG SCHUSTER, PH.D., MICHAEL MITCHELL, PH.D,
PETER J. PITTS, AND ALEX M. BRILL**

I, Mark C. McLennan, hereby declare and state as follows:

1. I am over the age of eighteen and, if called as a witness, could competently testify to the matters set forth herein.

2. I am an attorney at Kirkland & Ellis LLP, and counsel to Defendants and Counterclaim-Plaintiffs Moderna, Inc. and ModernaTX, Inc. (“Moderna”) in this matter.

3. I make this declaration in support of Moderna’s *Daubert* Motion to Exclude the Expert Opinions of Catharine Lawton, Georg Schuster, Ph.D., Michael Mitchell, Ph.D., Peter J. Pitts, and Alex. M. Brill.

4. Attached as Exhibit G is a true and correct copy of the November 24, 2024 Opening Expert Report of Dr. Georg Schuster of Coriolis Pharma.

5. Attached as Exhibit H is a true and correct copy of the April 11, 2025 Deposition Transcript of Georg Schuster, Ph.D.

6. Attached as Exhibit K is a true and correct copy of the August 4, 2025 Third Sur-Reply Expert Report of Robert Prud'Homme, Ph.D.

7. Attached as Exhibit L is a true and correct copy of the August 6, 2025 Deposition Transcript of Georg Schuster, Ph.D.

8. Attached as Exhibit M is a true and correct copy of the February 14, 2025 Rebuttal Expert Report of Peter J. Pitts.

9. Attached as Exhibit N is a true and correct copy of the February 14, 2024 [sic] Responsive Expert Report of Alex M. Brill.

10. Attached as Exhibit Q is a true and correct copy of a September 18, 2024 presentation by Georg Schuster to counsel for Plaintiffs bearing bates GENV-01102754 through GENV-01102787.

11. Attached as Exhibit T is a true and correct copy of the April 30, 2025 Deposition Transcript of Michael Mitchell, Ph.D.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED in New York, New York, this 7th day of November 2025.

/s/ Mark C. McLennan
Mark C. McLennan

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 16, 2025, upon the following in the manner indicated:

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/s/ Travis J. Murray

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